



Lawrence Livermore National Laboratory

•
Making History Making a Difference

•
1952-2002

Environmental Protection Department

May 8, 2003

Ms. Luz Castillo, Senior Hazardous Substances Scientist
Statewide Compliance Division
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2737
SUBJECT: Response to the 2003 CEI Summary of Violations Report
Livermore Site
Lawrence Livermore National Laboratory (LLNL)

Dear Ms. Castillo:

This letter is being submitted as a response to the Summary of Violations report (dated April 10, 2003) resulting from the Compliance Evaluation Inspection (CEI) that the DTSC conducted at LLNL on March 17, 18, 19, and 21, 2003. You cited a total of four violations, the first violation related to training requirements, the second related to storage of two mixed waste containers (Q43498 and Q53568) for greater than one year in a permitted hazardous waste storage area, the third related to inadequate aisle space in Room 1002 of the West 614 cell, and the fourth related to operating record discrepancies. As noted on the Summary of Violations report, LLNL took steps (prior to the close-out meeting) to correct the second, third, and fourth violations.

In response to the first violation related to training requirements titled, "Failure to Provide a Review of Initial Training", LLNL has included in the attached document, an updated training status for hazardous waste management personnel who were identified by the DTSC during the 2003 CEI. Please contact me at (925) 422-3985 if you have any questions regarding this response.

Sincerely,

C ~ A?~tc -t-

Ellen Raber, Department Head Environmental Protection Department

ER/VS:cp

Attachment

An Equal Opportunity Employer. University of California. P.O. Box 808, L-005, L

(925) 422-3343 - Fax (925) 424-2415

. PR An~~n~q

'ermore, California 94550

PRAO3-039 May 8, 2003

Ms. Luz Castillo

Subject: Response to the 2003 CEI SUIIUnary of Violations Report Livermore Site
Lawrence Livermore National Laboratory (LLNL)

bcc w / attachment: J. Bowers

K. Cadwell

B. Heffner

S. Goodwin

J. Judge

J. Morris

K. Rauhut

V. Salvo

G. Sanford

J. Vukelich

OCC

PRAO3-039

bcc w / 0 attachment:

B. Fischer

C. Grandfield

R. Hollister

C. Susi Jackson

W. Kao, NNSA/LSO ESD

T. Kato

S. Kidd

R. Michalik

S. Terusaki

K. Warwick, NNSA/LSO ESD P. Yimbo

L-786 L-786 L-797 L-623 L-626 L-786 L-701 L-627 L-626 L-626 L-633

1-546 1-633 1-623 1-633 1-574 1-627 1-620 1-633 1-627 1-293 1-627

Attachment

The following information is provided in response to the 2003 CEI Summary of Violations (SOV) report, dated April 10, 2003.

Violation 1 - Failure to Provide a Review of Initial Training

Training records for the following LLNL personnel were requested by the DTSC during the March 2003 Compliance Evaluation Inspection (CEI). The job title preceding the individuals name is the job title that individual had at the time of this inspection. At the closeout meeting, LLNL provided the DTSC with comprehensive training plans for these job titles. These comprehensive training plans consisted of all courses required for a specific job title, including Part B Permit requirements, and all other training required by LLNL. Note that some of the training requirements listed in the comprehensive training plans are not related to hazardous waste operations. The purpose of the comprehensive training plans is to communicate all of the training requirements of a given position, to management, training staff and the individuals in those specific jobs.

The following updates the status of training for Radioactive Hazardous Waste Management (RHWM) personnel who were identified by DISC during the March 2003 CEI. This updated status summary responds to violation number one included in the 2003 CEI Summary of Violations (SOV) report received by LLNL from the DISC on April 10, 2003.

James Bertao, Legacy Waste Technician

Training required by: LLNL's Part B Operating Plan for Permitted Facilities

HS4610, Basic Respirator Training; frequency: 12 months, last completion date - 6/30/98.

RESPONSE: During this employee's previous position as a "Storage Technician" (1/14/02 -1/27/03) this training was required. However, he did not attend the training as scheduled. Since under his new job title he has 6 months to complete this training, he will take the course on 5/13/03.

HS4630, Self-Contained Breathing Apparatus; frequency: 12 months, last completion date - 4/11/00.

RESPONSE: During this employee's previous position as a "Storage Technician" (1/14/02 -1/27/03) this training was required. However, he did not attend the training as scheduled. Since under his new job title he has 6 months to complete this training, he will take the course on 5/13/03.

HS5690-CERT, Incidental Crane Safety Certification; frequency: 60 months, last completion date - not shown on the record provided; training record as of March 18, 2003 shows the due date for the course as "NOW".

RESPONSE: During this employee's previous position as a "Storage Technician" (1/14/02 -1/27/03) this training was required. However, he did not attend the training as scheduled. Since under his new job title he has 6 months to complete this training, he will take the course in May 2003.

Bradley Francis, Lab Pack Technologist

Training required b): LLNL's Part B Operating Plan for Pennitted Facilities

EP5200-005, Field Sampling, frequency: 24 months, last completion date- 8/25/00.

RESPONSE: Employee hired in this position on 10/7/02 and had 6 months to complete OJT training. Employee completed the training on 3/19/03.

EP5200-006, Hazardous Waste Sampling Operations; frequency: 24 months, last completion date - 8/14/00.

RESPONSE: Employee hired in this position on 10/7/02 and had 6 months to complete OJT training. Employee completed the training on 3/19/03.

Henry Mura, Storage Driver

Training required b~ LLNL's Part B O~erating Plan for Permitted facilities

EP5102-003, Reading Program: Management and Operations Personnel; frequency: 12 months/last completion date - 12/26/01.

RESPONSE: Employee completed training on 3/25/03.

EP5120-033, Waste Management Unit Inspection, Procedures, and Emergency Response, Liquid Waste Pumpouts; frequency: 24 months,last completion date - 2/27/01.

RESPONSE: Employee completed training on 5/1/03.

EP5120-038, Waste Management Unit Inspection, Procedures a~d Emergency Response, 1000-gallon Vacuum Tanker; frequency: 24 months, last completion date - 2/27/01.

RESPONSE: Employee completed training on 4/29/03.

Gilbert Ramirez, Area 612 Storage Tech

Training required b): LLNL's Part B 012erating Plan for Permitted Facilities

EP5120-039, Waste Management Unit Inspection, Procedures and Emergency Response, Receiving and Segr:egation; frequency: 24 months, last completion date - 1/15/01.

RESPONSE: Employee completed training on 3/24/03.

Joseph Salazar, Storage Driver

Training required by LLNL's Part B Operating Plan for Permitted Facilities

EPO055-100, Hazardous Waste Shipping; frequency: 36 months/last completion date - 3/16/00.

RESPONSE: Employee completed training on 3/19/03.

EP5120-022, Waste Management Unit Inspection, Procedures and Emergency Response, Building 693 Container Storage Units, frequency: 24 months, last completion date - 2/2/01.

RESPONSE: Employee completed training on 4/8/03.

EP5120-039, Waste Management Unit Inspection, Procedures and Emergency Response, Receiving and Segregation; frequency: 24 months, last completion date - 2/2/01.

RESPONSE: Employee completed training on 4/8/03.

HS5690, Incidental Crane Safety; frequency: 60 months, last completion date -10/7/99; training record as of March 18, 2003 shows the due date for the course as "NOW".

RESPONSE: Employee completed this training on 6/26/02. There was a technical problem with the training database (L TRAIN), which caused the course completion to be omitted from the course completion reports. This issue has been addressed and is resolved.

HS5690-CERT, Incidental Crane Safety Certification; frequency: 60 months, last completion date - 3/3/00; training record as of March 18, 2003 shows the due date for the course as "NOW".

RESPONSE: Employee completed this training on 6/26/02. There was a technical problem with the training database (L TRAIN), which caused the course completion to be omitted from the course completion reports. This issue has been addressed and is resolved.

Roy Wamer, Material Storage Technologist

Training required by LLNL's Part B Operating Plan for Permitted Facilities

EPO055-100, Hazardous Waste Shipping; frequency: 36 months, last completion date - 3/16/00.

RESPONSE: Employee completed training on 3/19/03.